

Rachael D. Lamkin (SBN 246066)
Karan Singh Dhadialla (SBN 296313)
BAKER BOTTS L.L.P.
101 California Street, Suite 3200
San Francisco, California 94111
Phone: (415) 291-6200
Fax: (415) 291-6300
rachael.lamkin@bakerbotts.com
karan.dhadialla@bakerbotts.com

Attorneys for Defendant NETFLIX, INC.

(Additional counsel listed in signature block)

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

LAURI VALJAKKA,

Plaintiff,

v.

NETFLIX, INC.,

Defendant.

Case No.: 4:22-cv-01490-JST

**NETFLIX, INC.'S ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED**

Judge: Hon. Jon S. Tigar

Having reviewed and pursuant to Honorable Jon S. Tigar's Standing Order Governing Administrative Motions to File Material Under Seal and Local Rule 79-5(f), Defendant Netflix, Inc. ("Netflix") hereby submits this Administrative Motion to Consider Whether Another Party's Material Should Be Sealed (the "Motion") in connection with Netflix's concurrently filed Motion for Preliminary Injunction. Netflix's Motion for Preliminary Injunction references Plaintiff Lauri Valjakka's licensing agreements, excerpts of Plaintiff's deposition transcripts, and excerpts of Plaintiff's responses and objections to interrogatories (included hereto as Exhibit Nos. A-I to the Declaration of Karan Singh Dhadialla in Support of this Motion ("Dhadialla Declaration"))—all of which contain information that Plaintiff has designated as "Confidential" or "Highly Confidential Attorneys' Eyes Only" under the Stipulated Protective Order entered in this action on July 25, 2022

(Dkt. No. 56).

For purposes of this Motion, and pursuant to Local Rule 79-5(f)(1), Netflix identifies the following documents or portions of documents that have been designated as confidential by Plaintiff:

<u>Document</u>	<u>Portions to be Considered to be Sealed</u>	<u>Designating Party</u>
Exhibit A ¹ (English translation of Licensing Agreement on Exclusive Right to a Patent between Lauri Valjakka and CDN Licensing for US Patent No. 8,495,167)	Entire document	Plaintiff Lauri Valjakka designated this document “Highly Confidential Attorneys’ Eyes Only”
Exhibit B (Excerpts from the June 2, 2023 deposition of Lauri Valjakka)	Highlighted portions containing party names to settlement and licensing agreements and any confidential terms	Plaintiff Lauri Valjakka designated the highlighted portions of this document “Highly Confidential Attorneys’ Eyes Only”
Exhibit C (Confidential Final Settlement Agreement and Release)	Entire document	Plaintiff Lauri Valjakka designated this document “Highly Confidential Attorneys’ Eyes Only
Exhibit D (Licensing Agreement on Exclusive Right to a Patent between Lauri Valjakka and CDN Licensing for US Patent No. 10,726,102)	Entire document	Plaintiff Lauri Valjakka designated this document “Highly Confidential Attorneys’ Eyes Only
Exhibit E (Patent License and License Option Agreement)	Entire document	Plaintiff Lauri Valjakka designated this document “Highly Confidential Attorneys’ Eyes Only
Exhibit F (Settlement and License Agreement)	Entire Document	Plaintiff Lauri Valjakka designated this document “Highly Confidential Attorneys’ Eyes Only
Exhibit G (Settlement Agreement)	Entire Document	Plaintiff Lauri Valjakka designated this document “Highly Confidential Attorneys’ Eyes Only
Exhibit H (Settlement and Patent License Agreement)	Entire Document	Plaintiff Lauri Valjakka designated this document “Highly Confidential Attorneys’ Eyes Only

¹ All Exhibits refer to those Exhibits attached to the concurrently filed Dhadialla Declaration.

Exhibit I (Excerpts from Plaintiff Lauri Valjakka's Second Supplemental Responses and Objections to Defendant Netflix's First Set of Interrogatories (No. 1-20))	Highlighted portions containing party names to settlement and licensing agreements and any confidential terms	Plaintiff Lauri Valjakka designated the highlighted portions of this document "Confidential" or "Highly Confidential Attorneys' Eyes Only"
Netflix's Motion for Preliminary Injunction	Highlighted portions containing party names to settlement and licensing agreements and any confidential terms	Plaintiff Lauri Valjakka designated the highlighted portions of this document "Highly Confidential Attorneys' Eyes Only"

This motion is supported by the Dhadialla Declaration and is being concurrently filed with a Proposed Order pursuant to this Court's Standing Order Governing Administrative Motions to File Material Under Seal. Notice

Dated: August 21, 2023

Respectfully submitted,

By: /s/ Karan Singh Dhadialla

Rachael D. Lamkin (SBN 246066)
Karan Singh Dhadialla (SBN 296313)
BAKER BOTTS L.L.P.
101 California Street, Suite 3200
San Francisco, CA 94111
Tel: (415) 291-6200
Fax: (415) 291-6300
rachael.lamkin@bakerbotts.com
karan.dhadialla@bakerbotts.com

Sarah E. Piepmeier, Bar No. 227094
SPiepmeier@perkinscoie.com
Elise S. Edlin, Bar No. 293756
EEdlin@perkinscoie.com
PERKINS COIE LLP
505 Howard Street, Suite 1000
San Francisco, California 94105
Telephone: +1.415.344.7000
Facsimile: +1.415.344.7050

Janice L. Ta (appearance pro hac vice)
JTa@perkinscoie.com
PERKINS COIE LLP
405 Colorado Street Suite 1700
Austin, Texas 78701

Telephone: +1.737.256.6100

Facsimile: +1.737.256.6300

Jassiem N. Moore (appearance pro hac vice)

JassiemMoore@perkinscoie.com

PERKINS COIE LLP

1201 Third Avenue, Suite 4900

Seattle, Washington 98101-3099

Telephone: +1.206.359.8000

Facsimile: +1.206.359.9000

Brianna Kadjo, Bar No. 303336

BKadjo@perkinscoie.com

PERKINS COIE LLP

1900 Sixteenth Street, Suite 1400

Denver, Colorado 80202-5255

Telephone: +1.303.291.2300

Facsimile: +1.303.291.2400

Attorneys for Defendant, NETFLIX, INC.